

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

**SEACORP, LLC
f/k/a SYSTEMS ENGINEERING
ASSOCIATES CORPORATION,**

Plaintiff

v.

TITAN ONE ZERO LLC

Defendant.

Case No. 1:22-cv-01019-PTG-IDD

**DEFENDANT’S RULE 26(A)(3) PRETRIAL DISCLOSURES AND
WITNESS AND EXHIBIT LISTS**

Pursuant to Fed R. Civ. P. 26(a)(3), the pretrial order in this matter (Doc. 29), and the Court’s Order extending deadlines (Doc. 41), Defendant, Titan One Zero LLC (“T10” or “Defendant”) hereby submits the following pretrial disclosures, witness list, exhibit list, and deposition designations:

I. WITNESSES

A. Witnesses that T10 Expects to Present

1. Christopher Wu, address and phone number already provided to Plaintiff, though Mr. Wu should only be contacted through the undersigned counsel.
2. David Strum, address and phone number already provided to Plaintiff, though Mr. Strum should only be contacted through the undersigned counsel.
3. Elizabeth Goetz-Patridge, address and phone number known to Plaintiff.
4. Jason Vetovis, address and phone number known to Plaintiff.

5. Kathleen Doherty, address and phone number known to Plaintiff.

6. David Cadorette, address and phone number known to Plaintiff.

T10 reserves the right (i) to call any and all witnesses arising out of discovery not completed to date, (ii) to call any custodians of records needed to overcome objection or secure admission of documents, (iii) to call impeachment and rebuttal witnesses, (iv) to call any and all witnesses listed by Plaintiff in this action, (v) to supplement, amend, or correct this witness list for any proper purpose, and (vi) to object to any witnesses listed by Plaintiff.

II. EXHIBITS¹

A. T10 Bates-Labeled Exhibits

T10 Beg #	T10 End #	Description	Expects to Offer Or May Offer
222	225	Emails between Defendant and Plaintiff – Subject: “Follow Up”	Expects to offer
257	257	Email – Goetz to Wu re: NIWC-P BAA Reconfigurable Multi-Modal Sensor Meeting Follow Up	Expects to offer
508	515	Emails RE: 4703.0000 Invoice 0001	Expects to offer
534	542	Emails RE: 4703.0000 budget/billing	Expects to offer
583	583	Letter- Goetz-Patridge to Wu re: Unmanned Maritime Vehicle Multi-Modal Sensing Network Stop Notice Subcontractor Costs and Audit Availability October 18, 2021	Expects to offer
670	691	PPT – Reconfigurable Multi-Modal Sensor BAA Kick-Off Meeting	Expects to offer
720	723	Email – Vetovis to Wu, GoetSTOP WORK Subcontract Unmanned Maritime Vehicle Multi-Modal Sensing Network	Expects to offer
745	748	MOD 1 – 30 June 2021	Expects to offer

¹ Unless expressly noted to the contrary, the designation of an email is intended to include the previous emails in the same email chain reflected in the email document and any attachments to the email.

800	802	MOD 2 – 24 Jan 2022	Expects to offer
820	820	Email – Wu to Vetovis re: STOP WORK Subcontract Unmanned Maritime Vehicle Multi-Modal Sensing Network	Expects to offer
840	844	Email – Flynn to Wu re: RE: [External] - NIWC-P BAA STOP WORK RFI	Expects to offer
843	843	Letter - Wu to Goetz-Patridge (Systems Engineering) Re: Subcontract; Unmanned Maritime Vehicle Multi-Modal Sensing Network August 12, 2021	Expects to offer
863	863	Email – Keller to Goetz re: NIWC-P BAA Reconfigurable Multi-Modal Sensor Meeting Follow Up	Expects to offer
1153	1154	Emails between Defendant and Plaintiff – Subject: “External SEACORP Settlement”	Expects to offer
1354	1355	Email – Mooney to Reyes re: Contract# N6600120C4703: CSWF Report	Expects to offer
1356	1356	Email – Mooney to Reyes re: Contract# N6600120C4703: CSWF Report	Expects to offer
1377	1377	Email – Mooney to Walsh, et al TITAN-SEACORP - Milestone 6 - Draft System Design	Expects to offer
1383	1383	Email – Silvia to Mooney et al re: Government Meeting Cancelled	Expects to offer
1650	1650	Contract & Shipment Number Invoices from 2021-01-03 to 2021-05-28	Expects to offer

B. SEACORP Bates-Labeled Exhibits

SEACORP Beg #	SEACORP End #	Description	Expects to Offer Or May Offer
456	457	Emails RE: NIWC Opportunity Teaming Agreement [TITANONEZERO - SEACORP]	Expects to offer
1111	1117	Emails RE: RSS Justification	Expects to offer
1118	1119	Contract Status Report	Expects to offer

1121	1122	Email RE: BI Weekly Technical Status reports wk ending 02/19/21 and attached Contract Status Report	Expects to offer
1123	1124	Emails RE: BI Weekly Technical Status reports wk ending 02/19/21 and attached Contract Status Report	Expects to offer
1125	1126	Email RE: Titan One Zero and attached Contract Status Report	Expects to offer
1160	1160	Timesheet Labor Charges (in native .xlsx format)	Expects to offer
1416	1417	Invoice 0001	Expects to offer
1616	1617	Email RE: BI Weekly Highlights wk ending 04/16/21 and attached Contract Status Report	Expects to offer
1637	1638	Email RE: BI Weekly Status Report for Titan 4703 wk ending 4/16/21/21 and attached Contract Status Report	Expects to offer
1734	1735	Emails RE: [External] - SEACORP Invoice #0001 (Contract # N6600120C4703) Incomplete Status	Expects to offer
2142	2147	Emails Re: Request Multi-Modal Sensor payload benchtop design information	Expects to offer
2155	2156	Concepts for Operations for Reconfigurable Multi-Modal Sensor Payload April 30, 2021	Expects to offer
2247	2247	Letter - Wu to Goetz-Patridge (Systems Engineering) Re: Subcontract; Unmanned Maritime Vehicle Multi-Modal Sensing Network May 3, 2021	Expects to offer
2258	2258	Emails DeCosta to Varteresian RE: Stop Work Order - Titan	Expects to offer
2269	2269	Emails – Vetovis to DeitzTitan One Zero	Expects to offer
2272	2272	Emails – Vetovis to Wu RE: [External] - STOP WORK Subcontract Unmanned Maritime Vehicle Multi-Modal Sensing Network	Expects to offer
2273	2275	Email RE: BI Weekly Status Report for Titan wk ending 4/30/21 and attached Contract Status Report	Expects to offer
2366	2368	Email RE: 5/14/2021 Titan Monthly report and attached Contract Status Report	Expects to offer
2496	2501	Emails RE: Intern adds to TAs	Expects to offer

2517	2519	Email re: BI Weekly Status Report for Titan wk ending 5/28/21 and attached Contract Status Report	Expects to offer
2614	2174	Concepts for Operations for Reconfigurable Multi-Modal Sensr Payload 19 April 2021	Expects to offer
2628	2629	Emails RE: FW: Titan One Zero Status Reports	Expects to offer
2653	2658	Emails RE: 4703:0000 budget/billing	Expects to offer
2666	2668	Concepts for Operations for Reconfigurable Multi-Modal Sensr Payload 14 June 2021	Expects to offer
2672	2682	Concepts for Operations for Reconfigurable Multi-Modal Sensr Payload 14 June 2021	Expects to offer
2698	2698	Emails – Mooney to Reyes TITAN-SEACORP - Milestone 3 - Conceptual Development	Expects to offer
2761	2763	Email RE: Bi Weekly HL's wk ending 6/11/21 and attached Contract Status Report	Expects to offer
3008	3010	Email RE: BI Weekly Status Reports wk ending 6/25/21 and attached Contract Status Report	Expects to offer
3033	3035	Email RE: BI Weekly Status Report for Titan wk ending 6/25/21 and attached Contract Status Report	Expects to offer
3183	3183	Email RE: 4703.0000 Invoice 0003	Expects to offer
3244	3245	Videos Relating to Benchtop Demonstrations	May offer
3301	3302	Email RE: 4703.0000 Invoice 0003	Expects to offer
3348	3350	Email RE: BI Weekly Status Report for Titan wk ending 7/23/21 and attached Contract Status Report	Expects to offer
3400	3401	Emails RE: Past Due Invoice	Expects to offer
3542	3546	Emails RE: 4703.0000 Invoice 0003	Expects to offer
3559	3559	Letter from Costa to Fernandes re: Stop Work for PO# 210602	Expects to offer
3575	3575	Email RE: STOP WORK – PO# 210602	Expects to offer
3589	3591	Email RE: BI Weekly Reports wk ending 8/6/21 and attached Contract Status Report	Expects to offer
3705	3706	Email RE: BI Weekly Status Reports	Expects to offer

		wk ending 8/20/21 and attached Contract Status Report	
3785	3785	Email RE: PSR	May offer
3794	3795	Email RE: BI Weekly Status Reports wk ending 9/17/21 and attached Contract Status Report	Expects to offer
3936	3937	Email RE: BI Weekly Status Reports wk ending 10/01/21 and attached Contract Status Report	Expects to offer
4319	4321	Emails RE: Titan One Zero	May offer
4575	4575	Email RE: Titan One – 4703	May offer
4726	4731	Emails RE: NIWC-P BAA Reconfigurable Multi-Modal Sensor Meeting Follow Up	Expects to offer
4741	4742	Emails RE: funding spent on Titan contract	Expects to offer
4834	4841	Emails RE: STOP WORK Subcontract Unmanned Maritime Vehicle Multi-Modal Sensing Network	May offer
4996	5000	Videos relating to Benchtop Demonstrations	May offer
5041	5042	Invoices 2021	Expects to offer
5049	5055	Invoices and Emails from Wright RE: RSS invoices	Expects to offer
5065	5069	Invoices and Emails from Wright RE: RSS invoices	Expects to offer
5148	5149	Invoice from RSS to Sea Corp September 13, 2021	Expects to offer

C. Exhibits without a Bates Label

Exhibit	Expects to Offer Or May Offer
Subcontract, ECF 17-1, 1-35. [Deposition Ex. 1]	Expects to offer
Plaintiff's Answers to Defendant's First Set of Interrogatories	May offer
22 July 2021 Reconfigurable Multi-Modal	Expects to offer

Sensor Payload (RMMSP) Software Design Document (SDD) – (Insert Doc #) [Deposition Ex. 32]	
Plaintiff’s Rule 26(a)(1) Disclosures and all Supplements	May offer
Plaintiff’s Answers to Defendant’s First Set of Requests for Admissions	May offer
Defendant and Counterclaim Plaintiff Titan One Zero LLC’s Objections and Responses to Interrogatories	May offer
Second Amended Notice of Corporate Designee Deposition Fed. R. Civ. P. 30(b)(6)	May offer
Titan One Zero LLC’s Answer to First Amended Complaint and Counterclaims	May offer
T10’s Initial Disclosures and Exhibit A to Initial Disclosures	Expects to offer
SEACORP’s Answer to T10’s Counterclaim	May offer
First Amended Complaint	Expects to offer
Plaintiff’s Responses To Defendant’s Second Request For The Production Of Documents	May offer

D. Deposition Designations

Defendant intends to introduce testimony via deposition transcripts from the following out-of-state, nonparty witnesses: Matthew Konrad, Jeffrey Schult, Caroline Varteresian, Brian Mooney, and Daniel Todd.

Deposition of Matthew Konrad, July 6, 2023:

Page(s)	Lines
1	1-22
10	1-22
11	1-22
12	1-2; 11-22
13	1-4
15-17	1-22
20	9-22
21	1-16
24-33	1-22
34	20-22
35	2-22
36	1-1
47	1-22
48	1-22
49	1-13
53-77	1-22
79	13-22

82-87	1-22
88	1-7
89	10-22
90-96	1-22
97	1-6; 13-22
98	1-22
101-109	1-22
110	1-20
113	5-22
114	1-4
120	6-22
121	1-5
123	2-18
127-128	1-22
129	1-15

Deposition of Brian Mooney, July 7, 2023:

Page(s)	Lines
1	1-22
12	12-22
13	1-18
17	1-22
18	1-20

25	13-22
26-29	1-22
30	1-3
32-38	1-22
39	3-5
41	2-9
43	18-22
44	1-9
45	4-22
46	1-8
48-54	1-22
56	20-22
57-63	1-22
66-85	1-22
87-104	1-22
120	5-22
121-126	1-22
127	1-6

Deposition of Jeffrey Schult, July 6, 2023:

Page(s)	Lines
1	1-22
12	8-14

15	22
16	1-8
19	3-22
20	1
23	13-22
24	1-9
27	14-22
28	1-22
29	1-13
33-34	1-22
35	1-13
46	16-22
47	1-22
48	14-22
49-52	1-22
53	1-15
59	1-22
60	1-14
65	13-22
66	1-10

Deposition of Daniel Todd, July 7, 2023:

Page(s)	Lines
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1	1-22
9	10-13
10	5-22
13	18022
15	5-22
16-20	1-22
21	1-14
23	1-22
24	1-2
25	7-22
26	1-17
27	19-22
28	1-21
30	1-14
36	13-22
37-40	1-22
41	1-6; 20-22
42-43	1-22
44	1
45	18-22
46	1-18
48	21-22
49-54	1-22

55	1-5
56-57	1-22
58	1-6; 18-22
59-61	1-22
62	1-5; 8-17
63	13-22
64	1-21
65	1-22
66	4-7; 10-18; 20-22
67	1-3
68	4-22
69	1-3; 10-22
70-72	1-22
73	1-20
74	8-20
75	17-22
76-77	1-22
78	1-4

Deposition of Caroline Varteresian, June 27, 2023:

Page(s)	Lines
1	1-22
5	12-14

11	10-22
12	1-6; 16-21
20	16-22
21	1-11
22	12-22
23	1-12
25	2-18
27	3-22
28	1-2
30	3-22
31	1-4
34	7-22
35	1-1
36	18-22
37	1-22
38	1-17
39	14-22
45	12-22
46	1-22
48	5-22
49-56	1-22
57	1-8
61-62	1-22

63	15-22
64	4-22
65-73	1-22
74	1-14
77	10-22
78-82	1-22
83	1-20
84	2-22
85	1-22
86	1-19
90-97	1-22
99	9-22
100-101	1-22
102	1-12
103	6-22
104	1-22
105	18-22
106	1-20
107	1-19
109	6-22
110	1-22
111	1-9
121	9-22

122	1-22
123	1-8
126-127	1-22
128	1-12
138	7-22
139-143	1-22
144	1-14
149	19-22
150-161	1-22
162	1-3
163	14-22
160-170	1-22
171	1-10; 18-22
172-174	1-22
175	1-19

Defendant reserves the right (i) to use and introduce any documents arising out of discovery not completed to date, (ii) to use and introduce any affidavits from custodians of records needed to overcome objection or secure admission of documents, (iii) to use and introduce documents for impeachment and rebuttal witnesses, (iv) to use and introduce any exhibits listed by Plaintiff in this action, (v) to supplement, amend, or correct this exhibit and witness list for any proper purpose, (vi) to object to any exhibits listed by Plaintiff, and (vii) to use and introduce additional demonstrative exhibits.

Date: July 19, 2023

Respectfully Submitted,

/s/

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Walker J. Gray, Esq.
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Counsel for Titan One Zero LLC

CERTIFICATE OF SERVICE

I hereby certify that on July 19, 2023, I filed the foregoing with the Clerk of Court using the Court's CM/ECF system, which will then send notification of this filing to the following users:

Matthew E. Feinberg, Esq.
Todd Reinecker, Esq. (Pro Hac Vice)
Mansitan Sow, Esq.
PILIEROMAZZA PLLC
1001 G Street NW, Ste.1100
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_____/s_____
Walker J. Gray